

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
ECF CASE

SOKOL HOLDINGS, INC., BRIAN SAVAGE,
and THOMAS SINCLAIR,

Plaintiffs,

Case No. 05 CV 3749 (KMW) (DF)

- against -

BMB MUNAI, INC., ALEXANDRE AGAIAN,
BAKHYTBEK BAISEITOV, GEORGES
BENARROCH, BORIS CHERDABAYEV,
MIRGALI KUNAYEV, CREDIFINANCE
CAPITAL, INC. and CREDIFINANCE
SECURITIES, LTD.,

**DECLARATION OF
JAMES E. JI IN SUPPORT
OF MOTION FOR
SUMMARY JUDGMENT**

Defendants.

JAMES E. JI, being first duly sworn upon oath, deposes and states as follows:

1. I am a member of the Bar of this Court and an attorney at Manning Curtis Bradshaw & Bednar LLC, counsel for Defendants in this action. I submit this Declaration in support of Defendants' Motion for Summary Judgment, dated November 10, 2009. The grounds for the Motion are fully set forth in the accompanying Memorandum of Law.
 2. For the Court's use in deciding this motion, I attach the following documents:

Exhibit Number & Description

- 1 Declaration of Natalie L. Redd

 - 1-A Sokol Holdings Inc. Business Plan of March 2003 (P00001-41)
 - 1-B E-mail to Brian Savage from Tom Sinclair dated August 22, 2003
(P00178)
 - 1-C E-mail to Brian Savage from Tom Sinclair dated May 20, 2003 (P00218)
 - 1-D Credifinance Letter of Interest of April 17, 2003 (P00295)

- 1-E BMB Press Release of August 18, 2003 (P00367-369)
1-F Emir-Oil LLP Share Sale-Purchase Agreement dated April 26, 2003
(P00549-571)
1-G Handwritten Receipt of May 12, 2003 (D27605)
1-H Emir-Oil LLP Share Sale-Purchase Agreement dated June 5, 2003
(D21489-514)
1-I Excerpts of Kazcommerts SEC Information Memorandum of February
2003 (D00000420-453)
1-J Excerpts of InterUnion Financial Corp. Form 10-QSB for Period Ending
Dec. 31, 2002
1-K InterUnion Press Release of August 9, 2002
1-L Excerpts of Hurricane SEC Form F-10 Filed November 29, 2002
1-M Excerpts of Transmeridian SEC Form S-3 Filed December 1, 2004
1-N Excerpts of EMPS Corp. SEC Form 10-KSB for Year Ended December
31, 2002
1-O Excerpts of Nelsonag Annual Report of 2002
1-P Email from Marcus to Manning of June 1, 2009
1-Q Email from Sinclair to Agaian of October 3, 2003
- 2 Excerpts of Boris Cherdabayev Deposition
3 Excerpts of Thomas Sinclair Deposition
4 Excerpts of Georges Benarroch Deposition
5 Excerpts of Mirgali Kunayev Deposition
6 Excerpts of Bakhytbek Baiseitov Deposition
7 Excerpts of Agaian Deposition
8 Declaration of Toleush Tolmakov
8-A Map
9 Declaration of Nikolay Klinchev
10 Declaration of Knut Sovold
11 Declaration of Georges Benarroch
11-A Falcon Corporate Business Plan of May 2002
11-B InterUnion Private Placement Memorandum of August 2002
11-C InterUnion Private Placement Memorandum of September 2003
11-D Email from Sinclair to Smith of February 26, 2003 (D10231-32)
11-E Email from Sinclair to Credifinance of March 31, 2003 (D10012-54)
11-F BMB Munai, Inc. Form 10-QSB for Period Ending December 31, 2003
(D0001326-49)
- 12 Plaintiffs' Responses to Defendants' First Set of Interrogatories
13 Excerpts of Brian Savage Deposition
14 Transcript for TSBS-CF of August 2003
15 Declaration of Hasanagha Ahmadov
16 Declaration of Iskander Urazovich Zhanaidarov

Dated: November 10, 2009
Salt Lake City, Utah

**MANNING CURTIS BRADSHAW
& BEDNAR LLC**

/s/ James E. Ji

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing **DECLARATION OF JAMES E. JI IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT** to be served in the method indicated below to the below-named attorneys this 10th day of November, 2009.

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